

WHAT TO EXPECT DURING AN INSPECTION



MISSISSIPPI DEPARTMENT OF
ENVIRONMENTAL QUALITY
Underground Storage Tank Branch

UST INSPECTIONS

Conduct approx 1,000 inspections/yr

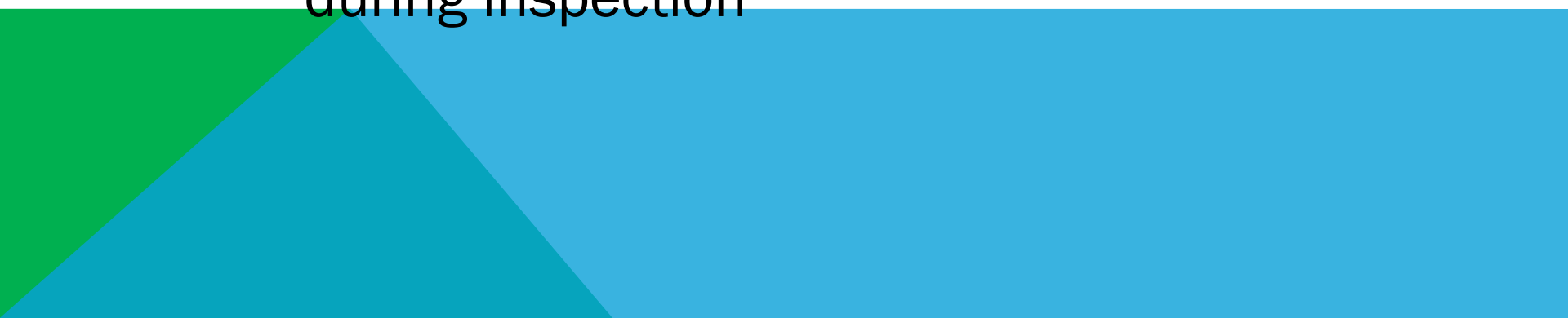
55% of inspections result in enforcement actions

Assess approx \$250,000 in civil penalties each year



EXPECTATION 1

Letter notifying you of the inspection which includes:

- Date
 - Time
 - Inspector
 - Phone number to contact if re-scheduling is required
 - List of all records that need to be present during inspection
- 

EXPECTATION 2

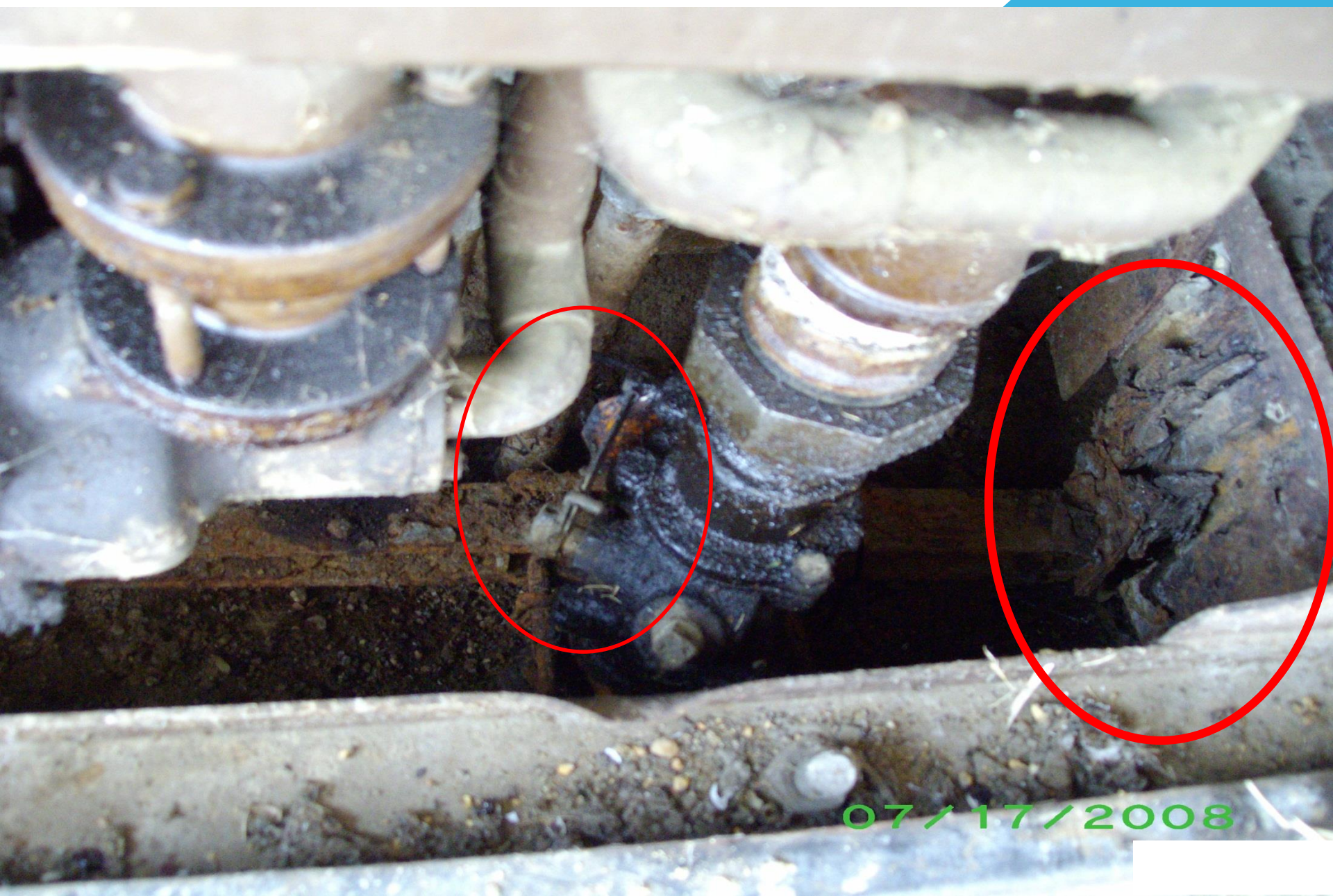
Meet your inspector on-site



EXPECTATION 3 - DISPENSERS TO BE OPENED



SHEAR VALVES ANCHORED, SHUT, AND MOUNTING BRACKET OK?



07/17/2008

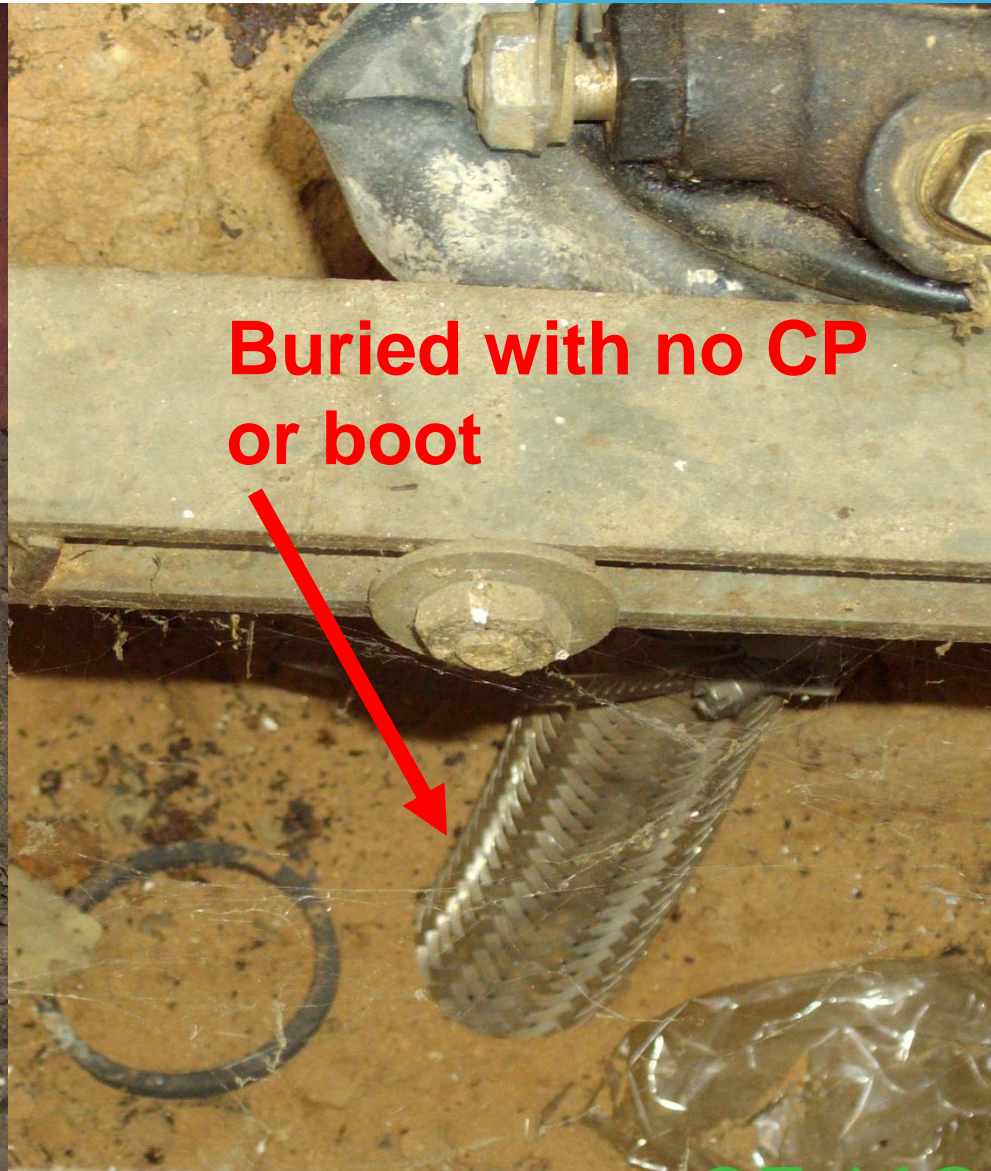
SHEAR VALVE NOT ANCHORED



FLEX CONNECTORS OK?



Frayed and buckled



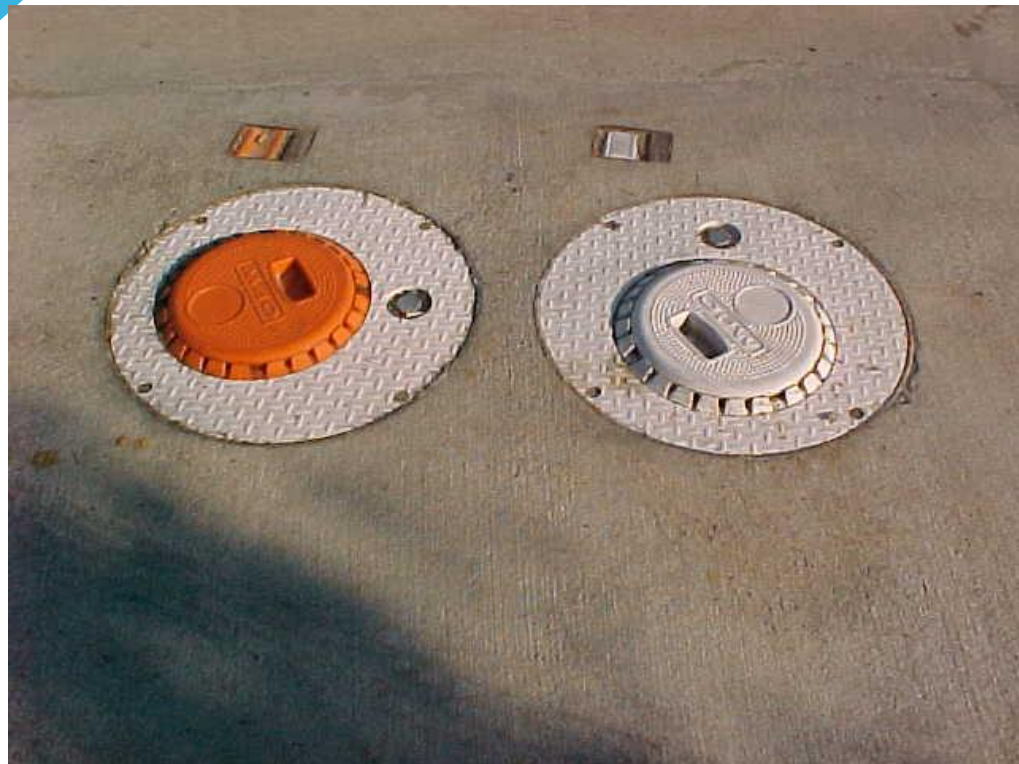
**Buried with no CP
or boot**

PIPING ELONGATION

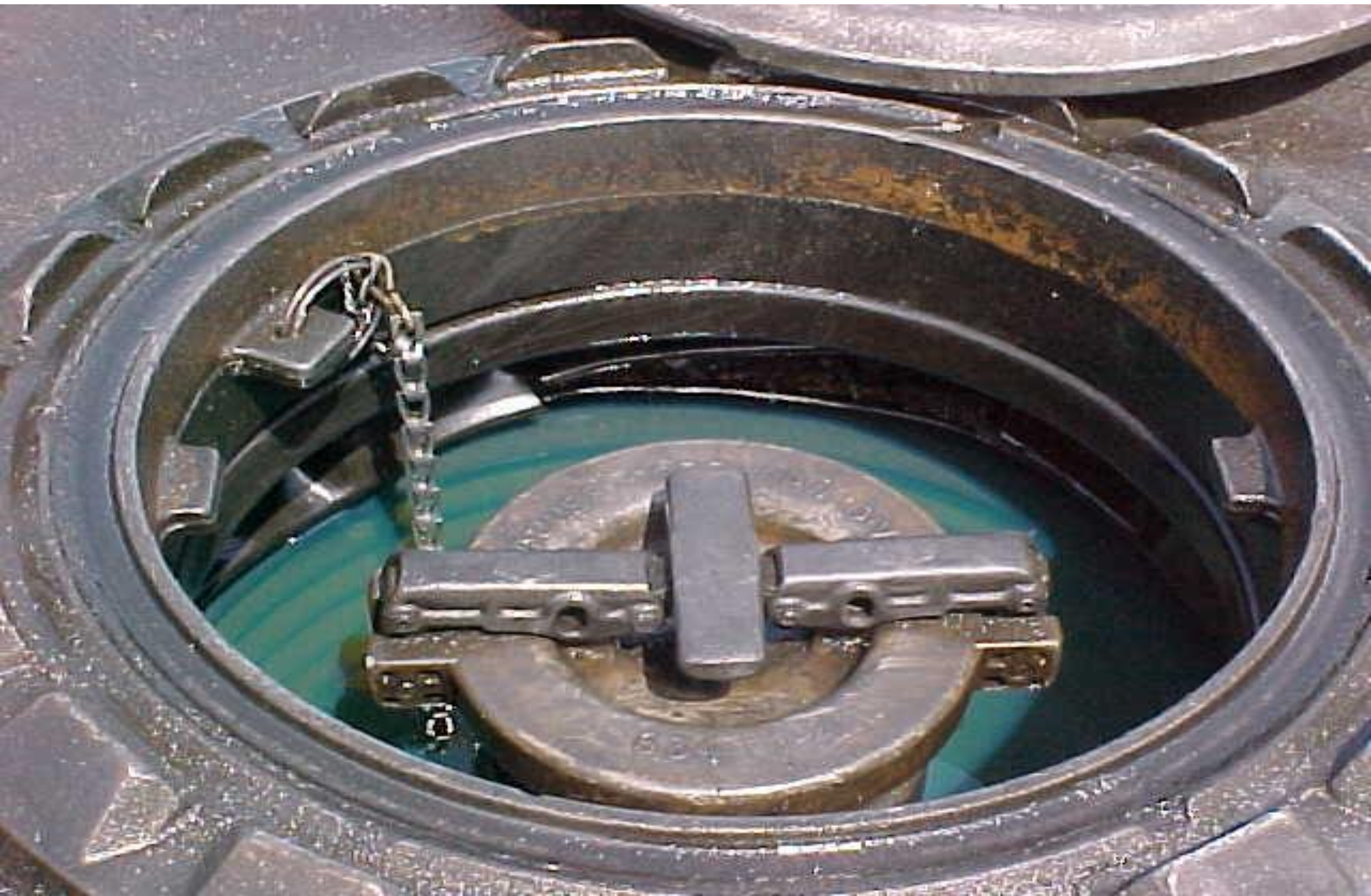


EXPECTATION 4

Check your spill buckets



Fuel in spill bucket



SPILL BUCKET INTEGRITY



Check for splits or tears



EXPECTATION 5 – CHECK OVERFILL PREVENTION

Determine
depth it is
set



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

ANNUAL OVERFILL PREVENTION DEVICE INSPECTION

- This form may be utilized to document inspection of UST overfill prevention devices.
- Inspection of all overfill devices is required at least once every 12 months.
- In the absence of a recognized industry procedure or manufacturer's recommended practice the 'MDEQ Overfill Device Inspection Procedure' outlined below may be utilized.

Date of inspection

UST Facility

Person Conducting Inspection

Facility Name Louisville Kiosk	MDEQ Facility ID # 12694	Inspector's Name Kevin Ellis
Physical Address 900 S Church St.		Company Ellis Enterprises, LLC
City Louisville	State MS	City Philadelphia
County Winston		Date 9-14-09

Overfill Prevention Device Inspection

Type of Overfill Device: ☒ Ball Float Valve ☐ Drop Tube Shutoff ☐ Electronic Alarm

MDEQ Overfill Prevention Device Inspection Procedure

Ball Float Valve	<ol style="list-style-type: none"> Remove filling/top and visually confirm that ball float valve is present and in good condition. Ensure that ball float valve is at proper height within the tank (restricts flow at 90% tank capacity). Ensure all tank top fittings are in good condition and appear to be vapor tight. If there is any question about functionality, remove, inspect, and reinstall device (see note below).
Drop Tube Shutoff	<ol style="list-style-type: none"> Remove tank fit cap and visually confirm that drop tube shutoff device is present and not obstructed. Ensure that the drop tube shutoff is at proper height within the tank (shuts-off flow at 95% tank capacity). Ensure that tight-fill adaptor on fill riser is in good condition. If there is any question about functionality, remove, inspect, and reinstall (see note below).
Electronic Alarm	<ol style="list-style-type: none"> Remove the electronic alarm device from the tank and visually inspect for damage or corrosion. Ensure the device functions correctly by causing an alarm condition (e.g. submerge in fluid). Reinstall the electronic alarm device in the tank (see note below) at the proper height within the tank. Ensure that alarm is audible and identifiable by the delivery person as an overfill alarm.

Note: MDEQ certification as a UST installer is required to install overfill prevention devices

Inspection Results for the Year

2009

Tank ID (product stored)	Reg	Open	Heavy	Offroad
Device present (yes/no)	yes	yes	yes	yes
In good condition (yes/no)	yes	yes	yes	yes
Set at correct height (yes/no)	no	no	no	no
Tank top fitting tight (yes/no)	yes	yes	yes	yes
Alarm audible (yes/no)				
Inspection result (Pass/Fail)	Fail	Fail	Fail	Fail

Comments: **All Tanks Have 6" Drop Tubes & need 14"**

BALL FLOAT DEVICE
NOT SET @
CORRECT HEIGHT

VERIFY EXISTING OVERFILL DEVICE



09/14/2010

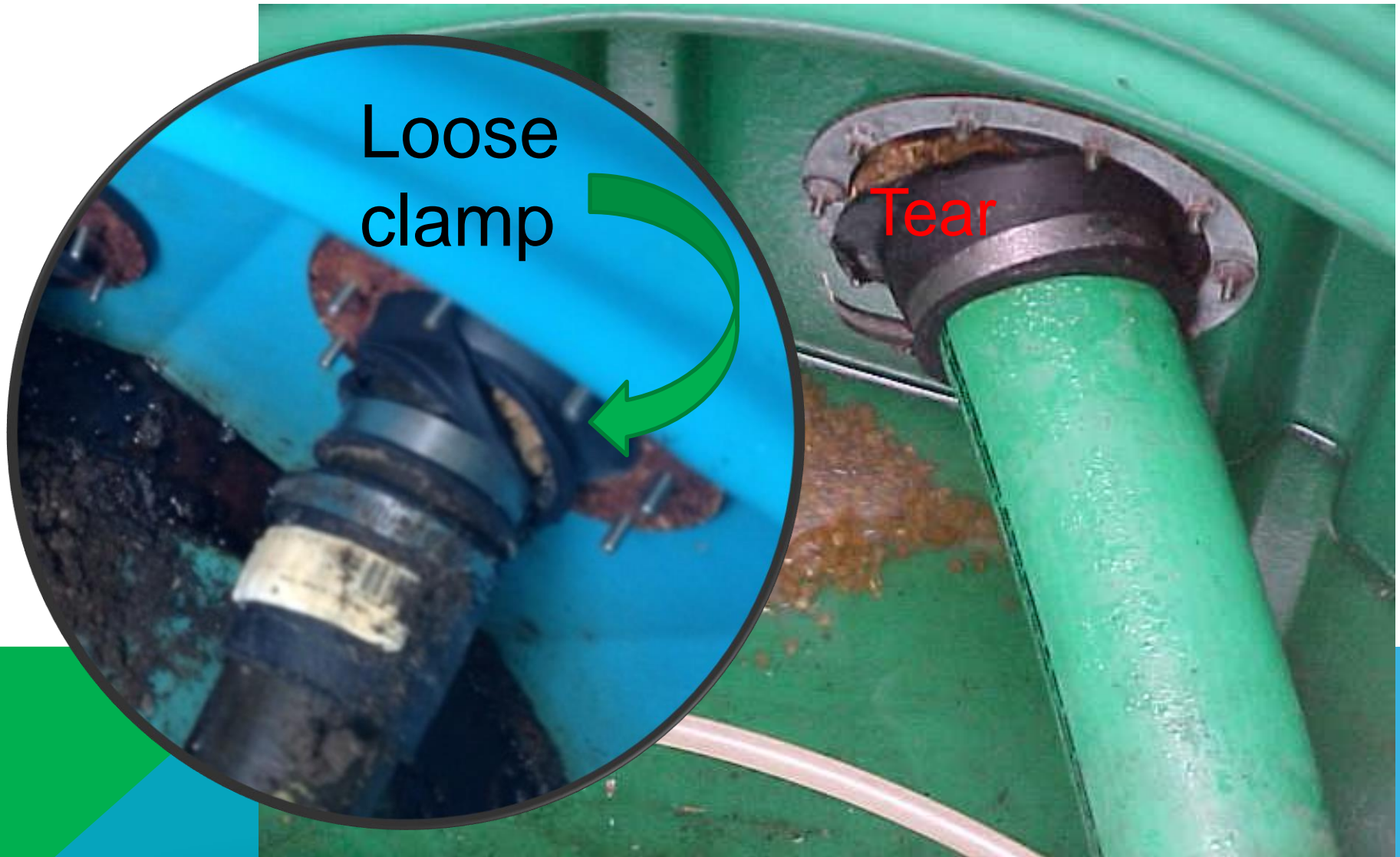
EXPECTATION 6 - OPEN ALL MANWAYS



MANWAYS SHOULD BE CLEAR OF WATER AND SOIL



PROBLEMS IN SUMPS?



NO CATHODIC PROTECTION



07/16/2008

EXPECTATION 7

CHECKING YOUR
CATHODIC PROTECTION
SYSTEM

RECTIFIER ON, WORKING AND ACCESS TO PIPING



RECTIFIER NOT OPERATING PROPERLY



07/18/2008

**Cathodic protection
working?**





EXPECTATION 8 – REVIEW YOUR RECORDS

RECORDS SHOULD INCLUDE:

- 12 months leak detection records for piping
- 12 months leak detection records for tanks
- Annual testing records (usually include:)
 - Shear valve check
 - Automatic line leak detector test
 - Spill bucket test
 - Overfill device inspection
- Cathodic protection 3 year test for tanks, pipes, and terminations
- 60 Day rectifier log (if applicable)
- Recent repair records

COMMON PAPERWORK ISSUES

Missing and misplaced records

Records are not easily accessible

Issues documenting a fail are not fixed

Registration of tanks / piping with MDEQ commonly is not what is actually out there.



Leak detection records indicating a leak are not reported to MDEQ

EXPECTATION 9 – FOLLOW-UP LETTER FROM MDEQ



STATE OF MISSISSIPPI
PHIL BRYANT
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
GARY C. RIZARD, EXECUTIVE DIRECTOR

July 19, 2016

To Whom It May Concern:

RE: Underground Storage Tanks (USTs)
3405 Cayce Road
Byhalia, Mississippi
Unregistered Location

The Mississippi Department of Environmental Quality (MDEQ) has determined that if an underground storage tank (UST) was empty or filled with water prior to 1988 (pre-88 tank), the tank has been permanently closed in accordance with the requirements of that time. Our office does not require sampling to occur or the tank to be removed from the ground or filled with an inert material (i.e. concrete, drilling mud).

There are no USTs registered with MDEQ at 3405 Cayce Road in Byhalia. If the USTs were out of use prior to adoption of the UST Regulations (December 22, 1988), the USTs were not typically registered with our department.

Please Note: If contamination is discovered resulting from the UST, the current tank owner/property owner at the time of discovery is responsible for any remedial action. Due to this item, our office recommends an assessment (soil or groundwater sampling) to be performed prior to the purchase of properties containing pre-88 tanks. But again, it is not required by our office.

If a UST has been out of service prior to 1988 and the owner decides to permanently close the tank (i.e. remove from the ground or close in place with fill material), the owner is not required to use a Mississippi Certified Contractor to permanently close the UST. However, due to safety reasons our office suggests the use of a Mississippi Certified Contractor for the permanent closure activities.

We appreciate your apparent concern for human health and the environment. Should you have any questions or comments, please do not hesitate to contact me at (601) 961-5117.

Sincerely,

Lynn Chambers
UST Branch

OFFICE OF POLLUTION CONTROL

Post Office Box 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.deq.state.ms.us
AN EQUAL OPPORTUNITY EMPLOYER

Either,

Inspection found no violations

**No Further Action (NFA)
Letter**

Or,

Inspection found violations

**Notice of Violation (NOV)
Letter**

COMPLIANCE CYCLE

Inspection



1st Notice of Violation (60 – 90 Days to correct)

- Attend administrative conference to discuss penalty /correcting violations, or
- Attend UST Workshop in lieu of paying penalty and correct violations



2nd Notice of Violation (30 days to correct)



3rd Notice of Violation (14 days to correct)



Delivery Prohibition enforced for any unresolved violations



EXPECTATION 10 – NO FURTHER ACTION

ethylbenzene, and xylenes (BTEX) to level. Therefore, this site does not pose a threat to public health. **No further action** is necessary to meet public health protection goals.

We greatly appreciate your cooperation. If you have any questions or comments, please call 800-455-6777.

Sincerely,

QUESTIONS?

